

(ASSIGNED BY DATA ANALYST) OECA DOCKET SYSTEM #03 - \_\_\_\_\_ - \_\_\_\_\_

**NON-CERCLA ADMINISTRATIVE CASE DATA FORM**

(RESERVED FOR DATA ANALYST'S USE) FINDS ID NO.: \_\_\_\_\_

RESPONDENT (CASE) NAME: United States Department of Agriculture, Beltsville Agricultural Research Cen  
(Primary Respondent's Name)DOCKET NUMBER: RCRA-03-2009-0052  
(Regional Hearing Clerk #)

TYPE CASE: RCRA 3008(a), 9006; (See Attached Listing)

REGIONAL TECHNICAL CONTACT: Melissa Toffel  
Phone: 215-814-2060REGIONAL ATTORNEY: Joyce Howell  
Phone: 215-814-2644FACILITY NAME (if different than Respondent (Case) Name: Beltsville Agricultural Research CenterStreet: 10300 Baltimore Avenue City: Beltsville County: Prince Georges State: MD Zip Code: 20705  
FACILITY ADDRESS (Pls. use the location of the facility where the violation(s) occurred, not a P.O. Box Number):FACILITY 4-DIGIT SIC Code(s): 9199 9292 Federal Facility? Y/N YESLAW/SECTION: RCRA 3008(a), RCRA 9006

(Statute/Section violated) (List Primary Law/Section First) (Add additional law/sections on blank sheet)

DATE COMPLAINT/AO/NOTICE OF DETERMINATION FILED: 3/26/2009

(Is this an amended complaint?) Y/N NO

y (Clock in with Regional Hearing Clerk)

PROPOSED PENALTY: \$65,066

Multi-Media Action? NO If yes, 4 option(s): Inspection Complaint Settlement SEP

Community/Geographically-Based Initiative? NO:

Describe:

Environmental Justice? NO If yes, ☒ option(s):       EJB (Env Justice-Minority Population & Low Income)       EJM (Env Justice-Minority Population)       EJI (Env Justice-Low Income)       EJO (Env Justice-Other)

Audit Policy Applied? NO If Yes, Disclosure Date: \_\_\_\_\_ / \_\_\_\_\_ / \_\_\_\_\_

y (Date of the disclosure letter)

Is this action to ENFORCE an ADMINISTRATIVE ORDER? NO

Is the State DELEGATED for the program? YES

Category of VIOLATOR (☒ appropriate category):RCRA        SNC (Significant Noncomplier or Significant Violator)       MEDP (Medium Priority Violator)

☒ NSHP (Non-SNC High Priority Violator)  
☐ LOWP (Low Priority Violator)

CWA ☐ SNC (Significant Noncomplier or Significant Violator)  
☐ NSMN (Non-SNC Minor)  
☐ NSMJ (Non-SNC Major) ☐ N/A (Not Applicable)

CAA ☐ SV (Significant Violator)  
☐ NSV (Nonsignificant Violator) ☐ N/A (Not Applicable)

TSCA, FIFRA ☐ SNC (Significant Noncomplier or Significant Violator)  
SDWA, EPCRA ☐ N/A (Not Applicable - EPCRA only)  
☐ NSV (Nonsignificant Violator) MPRSA ☐ MPRS

VIOLATION TYPE(S): REC

POLLUTANT(S): diesel fule, gasoline, kerosene, fuel oil

(See attached violation type listing; add additional violations and pollutants on blank sheet)

RELIEF SOUGHT: (4 as many lines as apply)

☐ COL (Collection of a pre-existing debt) ☒ PEN (Penalty)

☒ INJ (Injunctive Relief) ☐ CRA (Cost Recovery)

CFR Violation Citation(s):

40 CFR 262.32

40 CFR 262.11

40 CFR 264.16

40 CFR 264.171

40 CFR 280.43

40 CFR 280.44

(Add additional citations on blank sheet)

Case Summary: (Add additional Case Summary information on blank sheet)

At the time of the March 21, 2007 CEI, Respondent accumulated hazardous wastes in containers at the Facility that were not clearly labeled or marked with the words "Hazardous Waste," as required by COMAR 26.13.03.05E(1)(f).

1. At the time of the March 21, 2007 CEI, Respondent did not maintain at the Facility records that document as required by COMAR 26.13.05.02G(4)(d), that the hazardous waste training or job experience required under COMAR 26.13.05.02G(1), (2) and (3) had been given to and completed by facility personnel, as required by COMAR 26.13.03.05E(1)(g), which in turn references COMAR 26.13.05.02G.
2. At the time of the March 21, 2007 CEI, Respondent failed to transfer hazardous waste in a container not in good condition to a container in good condition or manage the waste in some other way that complies with COMAR 26.13.05, as required by COMAR 26.13.03.05E(1)(d), which in turn references COMAR 26.13.05.09.
3. At the time of the March 21, 2007 CEI, Respondent did not maintain at the Facility records documenting that the hazardous waste training or job experience required under COMAR 26.13.05.02G(1), (2) and (3) had been given to and completed by facility personnel, as required by COMAR 26.13.05.02G(4)(d).

4. At the time of the March 21, 2007 CEI, Respondent had not performed waste determinations on certain solid wastes, specifically, used aerosol cans generated from machinery shop at the Facility.
5. At the time of the March 21, 2007 CEI, Respondent failed to transfer hazardous waste in a container not in good condition to a container in good condition, or to manage the waste in some other way that complies with COMAR 26.13.05., as required by COMAR 26.13.05.09B.
6. Respondent did not perform release detection as required by COMAR 26.10.05.02.B on the 4,000 gallon diesel UST at Building 27 at the Facility from November 1, 2007 - February 28, 2008.
7. Respondent did not perform release detection as required by COMAR 26.10.05.02.B on the 4,000 gallon gasoline UST at Building 27 at the Facility from November 1, 2007 - February 28, 2008.
8. Respondent did not perform release detection as required by COMAR 26.10.05.02.B on the 2,000 gallon diesel UST at Building 445/446/447 at the Facility from November 1, 2007 - February 28, 2008.
9. Respondent did not perform release detection as required by COMAR 26.10.05.02.B on the 10,000 gallon diesel UST at Building 445/446/447 at the Facility from November 1, 2007 - February 28, 2008.
10. Respondent did not perform release detection as required by COMAR 26.10.05.02.B on the 550 gallon kerosene UST at Building 445/446/447 at the Facility from November 1, 2007 - February 28, 2008.
11. Respondent did not perform release detection as required by COMAR 26.10.05.02.B on the 2,500 gallon diesel UST at Building 166 at the Facility from November 1, 2007 - February 28, 2008.
12. Respondent did not perform release detection as required by COMAR 26.10.05.02.B on the 4,000 gallon gasoline UST at Building 166 at the Facility from November 1, 2007 - February 28, 2008.
13. Respondent did not perform release detection as required by COMAR 26.10.05.02.B on the 4,000 gallon gasoline UST at Building 301D at the Facility from November 1, 2007 - February 28, 2008.
14. Respondent did not perform release detection as required by COMAR 26.10.05.02.B on the 4,000 gallon diesel UST at Building 301D at the Facility from November 1, 2007 - February 28, 2008.
15. Respondent failed to conduct annual tests of the line leak detector for the piping associated with the 10,000 gallon UST used to store gasoline at Building 445 at the Facility, which routinely contained regulated substances and conveyed regulated substances under pressure, from March 1, 2002 though December 31, 2007.
16. Respondent failed to conduct annual tests of the line leak detectors for the piping associated with the 4,000 gallon UST used to store gasoline at Building 166 at the Facility, which routinely contained regulated substances and conveyed regulated substances under pressure, from March 1, 2002 though December 31, 2007.
17. Respondent did not perform an annual line tightness test in accordance with COMAR 26.10.05.05C or conduct monthly monitoring in accordance with COMAR 26.10.05.05D for the pressurized piping associated with the 4,000 gallon UST used to stored gasoline at Building 166 at the Facility from March 2,

2007 through November 26, 2007.

## A. CASE AND FACILITY BACKGROUND

1. Regional Hearing Clerk Docket Number RCRA-03-2009-0052  
2. Respondent(s) or Defendant(s) (Enforcement Action) Name United States Department of Agriculture, Agricultural Research Service  
3. Facility Name(s) Beltsville Agricultural Research Service  
4. Facility Address: (No P.O Box) Street: 10300 Baltimore Avenue City: Beltsville County: Prince Georges St: MD Zip: 20705  
5.(a) Primary 4-digit SIC-code(s) 9199, 9292, \_\_\_\_\_; Federal Facility?(YES)  
6.(a) EPA Lead Attorney Joyce Howell (3RC30) (b) EPA Technical Contact Melissa Toffel (3LCD70)  
7. Violation Type- (section of statute that authorizes pursuit of penalty and/or injunctive relief) (check ones that apply):

- ☒ RCRA 3008A (AO for Compliance and/or Penalty) ☐ RCRA 7003 (AO for Imminent Hazard)  
☐ RCRA 3008H (AO for Corrective Action) ☒ RCRA 9006 (AO for Compliance and/or Penalty (UST))  
☐ RCRA 3013 (AO for Compliance) ☐ RCRA 9006FC (Field Citation-UST)

Law(s), Section(s) and Subsection(s) violated (check the ones that apply):

- ☐ RCRA 3002 (Large Quantity Generator) ☐ RCRA 3013 (Generators)  
☒ RCRA 3002 (Small Quantity Generator) ☐ RCRA 3013 (TSD)  
☐ RCRA 3002 (Conditionally Exempt Small Quantity Generator) ☐ RCRA 3013 (Transporters)  
☐ RCRA 3003 (Transporter) ☐ RCRA 7003 (Solid Waste)  
☐ RCRA 3003 (Transfer Station) ☐ RCRA 7003 (Hazardous Waste)  
☐ RCRA 3004 (Interim) ☐ RCRA 9003 (Corrective Action)  
☐ RCRA 3004 (Permitted) ☐ RCRA 9003 (Corrective Petroleum Waste)  
☐ RCRA 3004VU (TSD Corrective Action) ☐ RCRA 9003 (Regulatory Hazardous Substance)  
☐ RCRA 3008H (Interim Status Corrective Action Order) ☒ RCRA 9003 (Regulatory Petroleum)  
☒ RCRA 9005 (Inspections, Monitoring, Testing, Corrective Actions)

8. Settlement Action Type and Date (check the one that applies):

(a) 40 CFR Part 22 settlement:

Type of Action:

- i. ☐ CAFO \_\_\_\_\_ (date clocked in with Regional Hearing Clerk)  
ii. ☒ SuperCAFO (under 40 CFR Sec. 22.13(b) authority) 3/26/2009 (date clocked in with Regional Hearing Clerk)  
iii. ☐ Final Order (under Quick Resolution, 40 CFR 22.18(a)(3)) \_\_\_\_\_ (date clocked in with Regional Hearing Clerk)  
iv. ☐ Expedited Settlement Agreement (use for Field Citations) \_\_\_\_\_ (date clocked in with Regional Hearing Clerk)  
  
(b) ☐ Administrative Orders or Administrative Compliance Orders \_\_\_\_\_ (date signed by DD or RA)  
(c) ☐ Notice of Determination(NOD) or Notice of Non-Compliance(NON) \_\_\_\_\_ (date signed by Chief or RA)  
(d) ☐ Consent Decree Resolving a Civil Judicial Action- C D to be Lodged \_\_\_\_\_ (date signed by RA)  
(e) ☐ Consent Decree or Court Order Resolving a Civil Judicial Action \_\_\_\_\_ (date filed/entered by the Court)

9. List names of all Respondent(s)/Defendant(s). List names (if different) of the Facilities (where the violation(s) occurred). Indicate which are a Small Business (<100 employees) by placing an "SB" designation after the name. Attach additional sheets as necessary.

United States Department of Agriculture, Agricultural Research Service

## 10. SECTION NOT BEING UTILIZED.

11. Was the Agency activity taken in response to Environmental Justice concerns? (NO) If yes, ☒ option(s) below:  
☐ Low Income ☐ Minority Population & Low Income ☐ Minority Population ☐ Other  
12. Was Alternative Dispute Resolution used in this action? (Y/N)

B. CORE PRIORITY (pls circle) ☒ (Y/N) If no, one of the priorities below in blocks C or D must be Yes

C. NATIONAL ENFORCEMENT PRIORITY ACTIVITY ☒ (Y/N) If Yes, ☒ option(s) below:

- ☐ Mineral Processing ☐ Financial Assurance

D. REGIONAL PRIORITY FY 2007 ☒ (Y/N) If Yes, ☒ option(s) below:

- ☐ Integrated Strategies ☐ RCRA Financial Responsibility  
☐ RCRA Foundries ☐ RCRA I District of Columbia

**E. PENALTY (if there is no penalty, enter 0)**

13. Federal Penalty Required \$ 65,066  
14. (if shared) Federal Share \$ \_\_\_\_\_  
15. (if shared) State or local Share \$ \_\_\_\_\_  
16. NOT BEING UTILIZED.

**F. 17. SECTION NOT BEING UTILIZED.****G. INJUNCTIVE RELIEF/COMPLIANCE ACTIONS (Non-SEP) Part 22 settlements w/o inj. relief,--SKIP THIS SECTION)**

18. What action did Respondent/Defendant take prior to receipt of settlement/order or will take to return to compliance or meet addl. requirements (other than what has already been reported on the Inspection Conclusion Data Sheet (ICDS). The Region can take credit for pollutant reductions which result from the Agency's enforcement even though the action being reported on this form does not specifically require such reductions. Where separate penalty and/or compliance orders are issued regarding same violation(s), report the following information for only one of those orders. Select response(s) from the following

**Actions with Direct Environmental Benefits and/or Direct****Response/Corrective Action (check all that apply)**

- |   |                                       |
|---|---------------------------------------|
| <input type="checkbox"/> Waste Minimization (RCRA)  | <input type="checkbox"/> Haz Waste    |
| <input type="checkbox"/> Waste Treatment (RCRA)   | <input type="checkbox"/> Gasoline     |
| <input type="checkbox"/> Containment (Corrective Action)                                  | <input type="checkbox"/> Oil          |
| <input type="checkbox"/> In-situ or Ex-situ Treatment (Corrective Action)                 | <input type="checkbox"/> Contam. Soil |
| <input type="checkbox"/> Removal of Contaminated Medium (Corrective Action, RCRA, or UST) |                                       |

**Quantitative Environmental Impact****Annual Amount****Unit****Impacted Media**

- |   |  |
|---|--|
| <input type="checkbox"/> Yards <sup>3</sup> | <input type="checkbox"/> Land          |
| <input type="checkbox"/> Pounds             | <input type="checkbox"/> Air           |
| <input type="checkbox"/> Soil               | <input type="checkbox"/> Ground Water  |
|   | <input type="checkbox"/> Surface Water |

Cost of Direct actions described above \$ \_\_\_\_\_

What, if any, preventative actions to reduce the likelihood of future releases did Respondent/Defendant take to return to compliance or meet additional requirements?

**Preventative Actions to Reduce the Likelihood of****Future Releases (check all that apply)**

- |   |   |
|---|---|
| <input checked="" type="checkbox"/> Storage Change (RCRA)         | <input checked="" type="checkbox"/> Haz Waste |
| <input type="checkbox"/> Disposal Change (RCRA)                   | <input type="checkbox"/> Gasoline             |
| <input type="checkbox"/> Secondary Containment (RCRA)             | <input type="checkbox"/> Oil                  |
| <input type="checkbox"/> Labeling/Manifesting (RCRA)              | <input type="checkbox"/> Contam. Soil         |
| <input type="checkbox"/> Waste Identification (RCRA)              |   |
| <input type="checkbox"/> Secondary Containment (UST)              |   |
| <input type="checkbox"/> Tank Closure (UST)                       |   |
| <input type="checkbox"/> Corrosion or Overfill Installation (UST) |   |

**Quantitative Environmental Impact****Annual Amount****Unit****Impacted Media**

- |   |  |
|---|--|
| <input checked="" type="checkbox"/> Gallons | <input checked="" type="checkbox"/> Land |
| <input type="checkbox"/> Yards <sup>3</sup> | <input type="checkbox"/> Air             |
|   | <input type="checkbox"/> Ground water    |
|   | <input type="checkbox"/> Surface water   |

Cost of preventative actions described above \$ 500.00

What, if any, facility or site management and information practices did Respondent/Defendant take to return to compliance or meet additional requirements?

**Facility/Site Management or Information Practices (check all that apply)**

- |   |   |   |                                       |
|---|---|---|---------------------------------------|
| <input type="checkbox"/> Auditing                             | <input type="checkbox"/> Monitoring         | <input checked="" type="checkbox"/> Spill Notification    | <input type="checkbox"/> Notification |
| <input type="checkbox"/> Environmental Management Review      | <input type="checkbox"/> Permit Application | <input checked="" type="checkbox"/> Testing/Sampling      |                                       |
| <input type="checkbox"/> Financial Responsibility Requirement | <input type="checkbox"/> Planning           | <input type="checkbox"/> Training                         |                                       |
| <input type="checkbox"/> Information Letter Response          | <input type="checkbox"/> Recordkeeping      | <input checked="" type="checkbox"/> UST Release Detection |                                       |
| <input type="checkbox"/> Labeling/Manifesting                 | <input type="checkbox"/> Reporting          | <input type="checkbox"/> Work Practices                   |                                       |

Cost of Management/Practices actions described above \$ 19,471

(No Quantitative Environmental Impact required for this section.)

**H. SUPPLEMENTAL ENVIRONMENTAL PROJECT (SEP) INFORMATION (NO) If Yes, ✓ option(s) below:****19. Categories of SEP(s) (Check all appropriate categories)**

Cost (Project Model calculation cost is preferred)

- ☐ (a) Public Health
- ☐ (b) Pollution Prevention (Complete Q. 20)
- ☐ (1) equipment/technology modifications
- ☐ (2) process/procedure modification
- ☐ (3) product reformulation/redesign
- ☐ (4) raw materials substitution
- ☐ (5) improved housekeeping/O&M/training/inventory-control
- ☐ (6) in-process recycling
- ☐ (7) energy efficiency/conservation
- ☒ (c) Pollution Reduction (Complete Q. 20)
- ☐ (d) Environmental Restoration and Protection
- ☐ (e) Assessments and Audits
- ☐ (f) Environmental Compliance Promotion

20. SEP description Purchase of three hybrid vehicles, retirement of 3 gas vehicles

21. Is Environmental Justice addressed by impact of SEP? (NO)

22. SEP Quantitative environmental pollutants and/or chemicals and/or waste-streams, amount of reductions/eliminations (e.g., emissions/discharges). Pl circle the applicable media and units.

Pollutant/Chemical/Waste Stream	Annual Amount	Units	Potentially Impacted Media
		Pounds	Land
		Pounds/year	Ground water
		Gallons/year	Surface water
		People	Wetlands
		Acres	Wastewater to POTW
		Linear feet (small stream)	Air
		Linear feet (medium stream)	Animals/Plants/Humans
		Linear feed (large stream)	Buildings/Houses/Schools

I. SELF-DISCLOSURE NO (If no, proceed to completing the Concurrences)

23. Date Violation Disclosed:       

24. Comments:       

25. Disclosure under Audit Policy? (Y/N) (If yes, you should NOT enter information in the SBREFA or Small Business fields)

26. Disclosure under EPA's Small Business Policy (<100 employees)? (Y/N)

27. Disclosure Received by an Office other than OECEJ? (Y/N) If yes, Office:       

28. Disclosure Part of Compliance Incentive Program Listing? (Y/N) If yes ☒ option(s) below:

- ☐ Bakers CFC Partnership Program    ☐ CMOM POTW Program    ☐ Colleges & Universities Program    ☐ Grain Processing Prog  
☐ Industrial Organic Chemical Program    ☐ Lead Disclosure Program    ☐ National Iron & Steel Incentive Program  
☐ Oil & Gas Program    ☐ Prisons Program    ☐ Storage Tank Emission Reduction Partnership Program  
☐ Stormwater/Commercial Development Program    ☐ Telecommunications Incentive Program    ☐ Wood Treaters Program

29. Outstanding Issues? (Y/N) If yes, please describe:       

30. Penalty Information for Audit Policy Cases only: (All fields required for Audit Policy)

(a) Penalty Calculation Before Mitigation: \$        (c) Gravity Based Penalty Assessed: \$       

(b) Gravity Based Penalty Waived:       % and \$        (d) Economic Benefit Assessed: \$       

31. Rationale for Not Applying Disclosure Policy (Use only if 30(b) and 30(c) above are zero)

- |   |   |
|---|---|
| <input type="checkbox"/> Actual Serious Harm or Imminent & Substantial Endangerment | <input type="checkbox"/> Agreement or Order Violated              |
| <input type="checkbox"/> Cooperation Insufficient                                   | <input type="checkbox"/> Deferred to the State                    |
| <input type="checkbox"/> Disclosure Not Prompt                                      | <input type="checkbox"/> Disclosure Not Voluntary                 |
| <input type="checkbox"/> Discovery and Disclosure Not Independent                   | <input type="checkbox"/> Entity Had Repeat Violations             |
| <input type="checkbox"/> Federal Facility That Would Not Be Liable for a Penalty    | <input type="checkbox"/> No Violation(s) Occurred                 |
| <input type="checkbox"/> Not a Systematic Discovery                                 | <input type="checkbox"/> Violation(s) Not Corrected Expeditiously |

CONCURRENCES

SYMBOL	3LC70	3RC30	3LC70	3RC30	3LC00	3RC00			
SURNAME	Toffey	Howell	Amend	Coe	Ferdas	Early			
DATE	3/10/09		3/13	3/13					

EPA Form 1320-1 (12-70)

OFFICIAL FILE COPY

ORC and Prg staff need to fill in and sign off on concurrence chain before package is placed into concurrence.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029

March 26, 2009

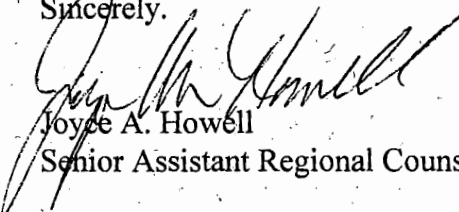
Lori Weidner  
U.S. Environmental Protection Agency  
Cincinnati Finance Center  
26 W. Martin Luther King Drive  
Cincinnati, OH 45268

Re: In the Matter of: United States Department of Agriculture, Agricultural  
Research Service  
Docket No. RCRA-03-2009-0052

Dear Ms. Weidner:

Enclosed please find a stamped copy of the SCAFO filed in this matter, together with a completed EARCNF. Thank you.

Sincerely,

  
Joyce A. Howell  
Senior Assistant Regional Counsel





**TO BE FILLED OUT BY ORIGINATING OFFICE:**

(Attach a copy of the final order and transmittal letter to Defendant/Respondent)

This form was originated by: Joyce Hamell  
Name of Contact person

3/26/2009  
Date

in the Office of Regional Counsel  
Office

at \_\_\_\_\_  
Phone number

\_\_\_\_ Non-SF Jud. Order/Consent  
Decree. DOJ COLLECTS

☒ Administrative Order/  
Consent Agreement  
FMD COLLECTS PAYMENT

\_\_\_\_ SF Jud. Order/Consent  
Decree. FMD COLLECTS

☒ This is an original debt \_\_\_\_\_ This is a modification

Name of Person and/or Company/Municipality making the payment  
IMO United States Dept. of Agriculture

The Total Dollar Amount of Receivable \$15,000  
(If in installments, attach schedule of amounts and respective due dates)

The Case Docket Number RCRA-03-2009-0032

The Site-Specific Superfund Acct. Number \_\_\_\_\_

The Designated Regional/HQ Program Office \_\_\_\_\_

**TO BE FILLED OUT BY LOCAL FINANCIAL MANAGEMENT OFFICE:**

The IFMS Accounts Receivable Control Number \_\_\_\_\_

If you have any questions call: \_\_\_\_\_  
Name of Contact Date

in the Financial Management Office, phone number: \_\_\_\_\_

**JUDICIAL ORDERS:** Copies of this form with an attached copy of the front page of the final judicial order should be mailed to:

- |   |   |
|---|---|
| 1. U.S. Environmental Protection Agency<br>Cincinnati Finance Center<br>26 W. Martin Luther King Drive (MS-002)<br>Cincinnati, OH 45268<br><br>Attn: Lori Weidner | 2. Originating Office (ORC)<br>3. Designated Program Office |
|---|---|

**ADMINISTRATIVE ORDERS:** Copies of this form with an attached copy of the front page of the administrative order should be sent to:

- |                           |                              |
|---------------------------|------------------------------|
| 1. Originating Office     | 2. Designated Program Office |
| 3. Regional Hearing Clerk | 3. Regional Counsel          |

Joyce Howell/R3/USEPA/US

04/09/2009 01:04 PM

To Carol Amend/R3/USEPA/US@EPA, Melissa  
Toffel/R3/USEPA/US@EPA

cc

bcc

Subject BARC penalty paid 4/7/09 by wire transfer

Joyce A. Howell  
Senior Assistant Regional Counsel  
USEPA Region III  
1650 Arch Street, MC 3LC70  
Philadelphia, PA 19103  
p:215.814.2644  
f: 215.814.3163